

EXHIBIT 76-11

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**DECLARATION OF DON WRIGHT IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

I, Don Wright, declare, under penalty of perjury under the laws of the State of Nevada, as follows:

1. I am the chairman and chief executive officer of Integrated Systems Improvement Services, Inc., d/b/a/ Special Intelligence Services ("SIS").
2. Sometime in or around the summer of 2014, I learned of Jackie Robinson's ("Robinson") efforts to create a new resort/basketball on the north end of the Las Vegas Strip (the "All Net Project").
3. The proposed All Net Project is substantial in scope, and would require more than two billion dollars in private funding to be successful.
4. As of the date of this Declaration, efforts to secure funding for the All Net Project are ongoing, but the project has not yet received funding.
5. Despite my knowledge that the All Net Project was not yet funded and that SIS would not get paid for its services until funding was received, I directed SIS to provide certain security services to the All Net Project in the hopes of creating a good impression and being "first in line" to get a long-term contract once the funding was received.
6. SIS occasionally hires subcontractors to help provide security services.
7. Trade Show Services, LTD., d/b/a Pro-Tect Security's ("Pro-Tect") is one subcontractor that SIS occasionally did business with.
8. In or around the Fall of 2014, SIS informed Pro-Tect of the All Net Project.
9. Pro-Tect expressed interest in getting involved in the All Net Project because of its potential to turn into a major source of revenue once the project started in earnest.
10. I informed Pro-Tect upfront that unless and until the All Net Project was funded, none of the contractors or subcontractors would be paid.

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1 11. Based on my conversations with Leslie Bruno, I believe Pro-Tect was well aware that the All
2 Net Project had no funding and no way to pay for any services, but Pro-Tect also understood
3 that by providing effective services, it stood a chance to convince key decision makers of Pro-
4 Tect's value, and thereby secure a long-term contract that could potentially last for the
5 duration of the proposed resort/arena's construction and beyond.

6 12. Based on my conversations with Leslie Bruno, I believe SIS and Pro-Tect both understood
7 that even upon the All Net Project receiving funding, there was no guaranty that they would
8 receive pay for work already performed. It was clear to me from my discussions with Pro-Tect
9 that both SIS and Pro-Tect were making an investment in the hopes of receiving long-term
10 contracts down the road. It is not clear to me whether the All Net Project will ever get funded.

11 13. At the time that this lawsuit was initiated, I did not even remember the existence of the
12 Subcontract Agreement because I considered it to be a placeholder or an outline of an
13 agreement that would be entered if and when the All Net Project was funded.

14 14. SIS did not specifically request any particular services to be performed by Pro-Tect pursuant
15 to the Subcontract Agreement.

16 15. As of the date of this Declaration, SIS has received no payments related to the All Net Project,
17 either for work that SIS itself performed, or for work performed by Pro-Tect or any other
18 subcontractor or third party.

19 16. ECF 76-1 is a true and correct copy of an October 2014 email exchange between myself, Luis
20 Vega, and Gene Tosti, the former director of development for Pro-Tect.

21 17. I make this Declaration freely and of my own free will and choice and I declare under penalty
22 of perjury under the law of the State of Nevada that the foregoing is true and correct
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24 DATED: July __, 2019

25 
26 Don Wright
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